

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**ROSE AMOUGOU NGASSAM**

**Plaintiff,**

**v.**

**MICHAEL CHERTOFF,  
Secretary of Department of Homeland  
Security; EMILIO GONZALEZ,  
Director of United States Citizenship &  
Immigration Services, F. GERARD  
HEINAUER, Director of the Nebraska  
Service Center of United States  
Citizenship & Immigration Services**

**Defendants.**

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**Case No: 07 Civ. 8172 (LLS)**

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that on the \_\_\_\_\_ day of October 2007, at \_\_\_\_\_ a.m. or as soon thereafter as counsel may be heard, attorneys for Plaintiff, shall move, before the Honorable Louis L. Stanton, U.S.D.J., United States Courthouse, Room 21C, 500 Pearl Street, New York, New York, 10007, for the entry of an Order in the form submitted herewith, granting to Plaintiff a Preliminary Injunction compelling and ordering the United States Citizenship and Immigration Services to comply with all federal regulations governing derivative asylum, and accordingly, to grant the three asylee-relative petitions which were wrongly denied by USCIS.

**PLEASE TAKE FURTHER NOTICE** that in support of this motion, Plaintiff shall rely upon this Notice of Motion, Memorandum of Law in Support of Plaintiff's Application for Order to Show Cause For Preliminary Injunction, the Affidavit of Rose Ngassam in Support of Order to

to Show Cause For Preliminary Injunction, the Affidavit of Rose Ngassam in Support of Order to Show Cause for Preliminary Injunction, the Affidavit of Sara Kahn, M.S.W., the Certification of Jenny-Brooke Condon in Support of Order to Show Cause for Preliminary Injunction, the Complaint and supporting exhibits submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that counsel for Plaintiffs hereby requests oral argument.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Bryan Lonagan', is written over the typed name.

**SETON HALL UNIVERSITY SCHOOL OF LAW  
CENTER FOR SOCIAL JUSTICE**

Attorney for Plaintiff

By: Bryan Lonagan Esq.

Jenny-Brooke Condon, Esq.

Gal Davidovitch (legal intern)

Jisun Chang (legal intern)